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6 Securities and Exchange Commission

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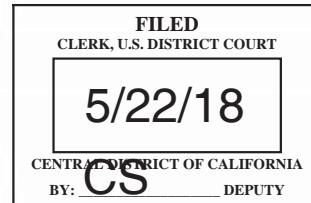
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18 Los Angeles, California 90071

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16
17 SECURITIES AND EXCHANGE
18 COMMISSION,

19 Plaintiff,

20 vs.

21 TITANIUM BLOCKCHAIN
22 INFRASTRUCTURE SERVICES, INC.;
23 EHI INTERNETWORK AND
24 SYSTEMS MANAGEMENT, INC. aka
EHI-INSM, INC.; and MICHAEL
ALAN STOLLERY aka MICHAEL
STOLLAIRE,

25 Defendants.

26 Case No. **CV18-4315-DSF(JPRx)**
SUPPLEMENTAL DECLARATION OF
DAVID S. BROWN

27 **(FILED UNDER SEAL)**

SUPPLEMENTAL DECLARATION OF DAVID S. BROWN

I, David S. Brown, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice law by the State Bar of California.

I am employed by the U.S. Securities and Exchange Commission (the
5 “Commission”) as a staff attorney in the Division of Enforcement in the Los Angeles
6 Regional Office in Los Angeles. I make this supplemental declaration in support of
7 the Commission’s *Ex Parte* Application For Temporary Restraining Order and
8 Orders: (1) Freezing Assets; (2) For Accountings; (3) Prohibiting the Destruction or
9 Alteration of Documents; (4) Expediting Discovery; (5) Appointing a Temporary
10 Receiver; and Order To Show Cause Why A Preliminary Injunction Should Not Be
11 Granted and Appointment of a Permanent Receiver. I have personal knowledge of
12 each of the matters set forth below based on the files and records the Commission has
13 obtained, and, if called as a witness, I could and would competently testify to the
14 facts stated herein.

2. Attached hereto as Exhibit 73 is a true and correct copy of excerpts of
“TBIS Weekly: GitHub, Consensus 2018, and a Mystery Logo” published on
steemit.com on or about April 20, 2018, which I downloaded and printed on May 21,
2018.

3. An officer of the Commission acting pursuant to the Formal Order
issued a subpoena duces tecum to U.S. Bank for copies of, among other things,
records showing recent transactions in the account held in the name of TBIS. U.S.
Bank responded to the subpoena and produced monthly statements for April 2018 and
outward payment reports, along with an affidavit from its custodian of records, true
and correct copies of excerpts of which are attached hereto as Exhibit 74.

4. Attached hereto as Exhibit 75 are true and correct copies of photographs
of the EHI website that I took and printed on May 21, 2018.

//

//

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct.

3 Executed this 21st day of May, 2018 at Los Angeles, California.

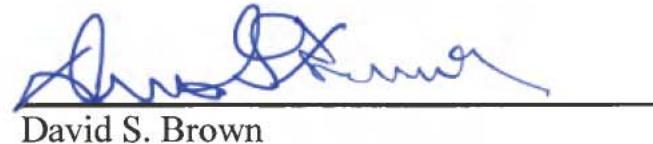
4
5 
6 David S. Brown

EXHIBIT 73



Trending

(/trending/cryptocurrency)

Log in (/login.html)

(/https://signuptostem.it.co/rhpt)

TBIS Weekly: GitHub, Consensus2018, and a Mystery Logo

tbis (37) ▾ (/@tbis) in cryptocurrency (/trending/cryptocurrency) • last month



EXHIBIT 73 PAGE 3



Trending

(/trending/cryptocurrency)

Login (/login.html)

(/https://signupto.steemit.com/r/hpt)

Hello Everyone!

Welcome back to another edition of TBIS Weekly. We were thrilled with the response from our first publication and glad everyone enjoyed it. We have some special topics to discuss this week, such as exciting employee spotlights and a new exchange! As usual, the questions submitted were of top quality and we want to thank you for asking them, as they stimulate real answers from the team!

You can submit questions here:

<https://goo.gl/bX4F11>

New Exchange

EXHIBIT 73 PAGE 4

steemit

Trending

Newgin (/login.html) Sign up

TBAR 正在交易

分散。防震。
Powered by Blockchain.

 **TITANIUM**
BLOCKCHAIN INFRASTRUCTURE SERVICES

FuBT 富比特
Hong Kong FUBT Asset Exchange www.fubt.top

当我在一起, 有了更大的力量
Together, we are the REVOLUTION.

Tbis.io

Titanium is happy to announce that TBAR has been listed on FuBT, a top Hong Kong exchange with a promising future. [Neogin \(Login.html\)](#) [Sign up](#)

Fubitian Domestic Station (Yanxing Network) has undergone a new revision with full upgrades in terms of technology, policy, direction, and other aspects. FuBT aspires to be an industry leader and aims to achieve a first-class international platform. It strives to contribute to the blockchain industry.

We are very pleased to be listed on FuBT! Currently only Chinese citizens can purchase TBAR , however they are expecting to be trading globally soon, at:

<https://www.fubt.top/>

Titanium Team Spotlight



EXHIBIT 73 PAGE 6

Hannes De Beer has been promoted to Creative Director for TBIS! Hannes has a very professional background within this technological field. After



To cast your vote, please visit <https://goo.gl/DxQaJE>

Community Voice

Q: When will github information be released?

A: TBIS loves open source projects and fully supports them. We will be working open sourcing much of what we build as time goes on and allows us to. Titanium is alike other companies, such as Netflix and AirBnB, as they do not give out all of what they build, but the snippets they do release are extremely cool and highly useful.

-Edward Wilson, Backend Engineer.

EXHIBIT 73 PAGE 7

Q: How do you pick your partnerships (for instance, other crypto projects) and what advantages do they bring to the Titanium team?



~~Trending~~ ~~Steemit~~ ~~Sign up~~
A: All future partnerships are based on merit and project interest. We are ~~Sign up~~
always on the lookout for ~~Trending~~ ~~Steemit~~ ~~Sign up~~ projects that align with our goals. ~~Sign up~~
and ideals. TBIS has a couple of strategic partnerships coming up that we
will be announcing soon!

- Richard Silver, COO.

Q: After the fork, what is the total supply of TBAR? What happened to the
other TBAR?

A: TBAR total supply is 60 million with a current circulating supply of
43,222,415 million.

-Monte Cristo, Community Manager

Q: It has been previously mentioned that masternodes will be
implemented into the TBIS Blockchain. Is this still a go and will there be
tiered functionality? Furthermore, how will these masternodes play into
supporting the IaaS and PaaS that Titanium will be offering?

A: Masternodes are still a go - they are planned to be tiered, but we are still
developing the blockchain and the wallet - the masternodes depend on
both of those. We do not have values yet, as we are still working out the
masternode functionality.

Currently masternodes are planned for ledger maintenance. I do not see
much functionality if any for MNs in IaaS or PaaS, but since we are still in
development of all of those components, something could come up for
MNs in that realm.

-Daniel Bereczki, CTO.

EXHIBIT 74



P.O. Box 1800
Saint Paul, Minnesota 55101-0800

3976 TRN

S Y ST01

Business Statement

Account Number:

6688

Statement Period:

Apr 2, 2018

through

Apr 30, 2018



Page 1 of 8

000153737 02 SP 10648156880939 E
TITANIUM BLOCKCHAIN INFRASTRUCTURE
SERVICES INC
DBA TBIS
5250 HIGHBANKS RD STE 250
SPRINGFIELD OR 97478-7691



To Contact U.S. Bank

24-Hour Business
Solutions:

1-800-673-3555

U.S. Bank accepts Relay Calls

Internet:

usbank.com

INFORMATION YOU SHOULD KNOW

Important Note: Effective May 14th, 2018:

- The Overdraft Protection Transfer fee:
 - Will be removed on automated transfers from U.S. Bank Business Deposit Accounts linked as Overdraft Protection.
 - Will be \$12.50 for each automated transfer from linked U.S. Bank Business Credit Card and Business Reserve Line Accounts and will be assessed to the business checking account.
- The Extended Overdraft Fee will change from \$25.00 per week. If the available account balance remains negative for seven consecutive calendar days, a fee of \$36.00 is charged on the eighth calendar day.
- The Business Reserve Line Annual fee of \$20 will be eliminated going forward.

There is no fee assessed when you manually transfer funds between the Business Reserve Line and a business checking account. You can manually transfer funds through online banking, mobile banking, in the branch or through our telephone bankers.

These changes serve as updates to the *Business Pricing Information Brochure* and *Your Deposit Account Agreement*. For any questions, please visit your local branch or call 800.673.3555.

SILVER BUSINESS CHECKING

Member FDIC

U.S. Bank National Association

Account Number **6688**

Account Summary

	# Items		
Beginning Balance on Apr 2		\$	38,967.43
Other Deposits	7		261,609.84
Card Withdrawals	45		26,690.94-
Other Withdrawals	54		230,153.59-
Checks Paid	5		10,179.88-
Ending Balance on Apr 30, 2018		\$	33,552.86

Other Deposits

Date	Description of Transaction	Ref Number	Amount
Apr 11	Electronic Deposit REF=18100066624660N00	From COINBASE.COM/BTC 14552939978889087930C88W6XRDAD30	\$ 54,907.39
Apr 17	Electronic Deposit REF=181060129524570N00	From COINBASE.COM/BTC 145529399788890879302DNT1A25AD30	23,580.06
Apr 23	Electronic Deposit REF=181100063571300N00	From COINBASE.COM/BTC 14552939978889087930ILC8PE23AD30	81,220.59
Apr 25	Electronic Deposit REF=181140047969850N00	From COINBASE.COM/BTC 14552939978889087930YB6UU1YJAD30	75,789.65
Apr 27	Electronic Deposit REF=181170071618010N00	From PAYPAL PAYPALRD33VERIFYBANK4AJDDTKPZFY 2	0.15
Apr 27	Electronic Deposit REF=181170071618000N00	From PAYPAL PAYPALRD33VERIFYBANK4AJ7PWT7J6YT2	0.18

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TITANIUM BLOCKCHAIN INFRASTRUCTURE
SERVICES INC
DBA TBIS
5250 HARBANKS RD STE 250
SPRINGFIELD OR 97478-7691

Business Statement

Account Number:
6688

Statement Period:
Apr 2, 2018
through
Apr 30, 2018



Page 2 of 8

SILVER BUSINESS CHECKING

(CONTINUED)

Account Number **6688**

U.S. Bank National Association

Other Deposits (continued)

Date	Description of Transaction	Ref Number	Amount
Apr 27	Electronic Deposit REF=181160148033780N00	From COINBASE.COM/BTC 14552939978889087930G0GUWZFCAD30	26,111.82
		Total Other Deposits	\$ 261,609.84

Card Withdrawals

Card Number: xxxx-xxxx-xxxx-1073

Date	Description of Transaction	Ref Number	Amount
Apr 2	Debit Purchase - VISA GOOGLE *PROJECT *****1073	On 033118 g.co/helppay CA REF # 24692168090100194824519	0100194824 \$ 58.99-
Apr 2	Debit Purchase - VISA HARBOR COMPLIANC *****1073	On 033018 717-723-9317 PA REF # 24801978089726272604572	9726272604 1,039.00-
Apr 3	Debit Purchase - VISA PAYPAL *GHOSTTEH *****1073	On 040218 402-935-7733 CA REF # 24492158092894801608718	2894801608 3,317.50-

Card 1073 Withdrawals Subtotal \$ 4,415.49-

Card Number: xxxx-xxxx-xxxx-6844

Date	Description of Transaction	Ref Number	Amount
Apr 3	Debit Purchase 033853 *****6844	ALBERTSONS STORE SPRINGFIELD OR On 040218 ILNKILNK REF 809212033853	5304020726 \$ 1,505.85-
Apr 6	Debit Purchase - VISA 76 - UNITED PACI *****6844	On 040518 SPRINGFIELD OR REF # 24015178095000919512056	5000919512 37.40-
Apr 6	Debit Purchase - VISA CLAIM JUMPER TUA *****6844	On 040518 SEATTLE WA REF # 24431068096206088100189	6206088100 63.00-
Apr 10	Debit Purchase - VISA COMCAST PORTLAND *****6844	On 041018 800-266-2278 OR REF # 24692168100100125375340	0100125375 169.90-
Apr 12	Debit Purchase - VISA CITY OF EUGENE P *****6844	On 041118 EUGENE OR REF # 24717058102121027009250	2121027009 0.55-
Apr 12	Debit Purchase - VISA CITY OF EUGENE P *****6844	On 041118 EUGENE OR REF # 24717058102121027006397	2121027006 1.00-
Apr 12	Debit Purchase - VISA CITY OF EUGENE P *****6844	On 041118 EUGENE OR REF # 24717058102121026991698	2121026991 1.25-
Apr 12	Debit Purchase - VISA CITY OF EUGENE P *****6844	On 041118 EUGENE OR REF # 24717058102121026987472	2121026987 2.40-
Apr 12	Debit Purchase - VISA CITY OF EUGENE P *****6844	On 041118 EUGENE OR REF # 24717058102121027000739	2121027000 2.40-
Apr 12	Debit Purchase - VISA SQ *NOISETTE PAS *****6844	On 041118 EUGENE OR REF # 24492158101740260764733	1740260764 11.00-
Apr 13	Debit Purchase - VISA CITY OF EUGENE P *****6844	On 041218 EUGENE OR REF # 24717058103121037746189	3121037746 0.75-

EXHIBIT 74 PAGE 10



TITANIUM BLOCKCHAIN INFRASTRUCTURE
SERVICES INC
DBA TBIS
5250 HIGHTBANKS RD STE 250
SPRINGFIELD OR 97478-7691

Business Statement

Account Number:
6688

Statement Period:
Apr 2, 2018
through
Apr 30, 2018



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SILVER BUSINESS CHECKING

(CONTINUED)

Account Number [REDACTED] -6688

U.S. Bank National Association

Other Withdrawals (continued)

Date	Description of Transaction	Ref Number	Amount
Apr 13	Electronic Withdrawal REF=181020152244540N00	From PAYROLL 4462800242PAYROLL 9525104	3,064.93-
Apr 13	Electronic Withdrawal REF=181020152244550N00	From PAYROLL 4462800242PAYROLL 9525104	3,246.26-
Apr 13	Electronic Withdrawal REF=181020152244560N00	From PAYROLL 4462800242PAYROLL 9525104	3,327.64-
Apr 13	Electronic Withdrawal REF=181020152244570N00	From PAYROLL 4462800242PAYROLL 9525104	3,762.45-
Apr 13	Electronic Withdrawal REF=181020152244580N00	From PAYROLL 4462800242PAYROLL 9525104	5,607.25-
Apr 18	Electronic Withdrawal REF=181070117748340N00	To PAYPAL PAYPALSI77INST XFER AKOCH471	86.61-
Apr 18	Electronic Withdrawal REF=181070139935570N00	From PAYROLL 4462800242PAYROLL 9525104	1,458.33-
Apr 19	Electronic Withdrawal REF=181090038701410N00	From Payroll 1943345425Tax 9525104	2,891.56-
Apr 19	Electronic Withdrawal REF=181090038701420N00	From Payroll 1943345425Tax 9525104	3,085.07-
Apr 20	Electronic Withdrawal REF=181090070385840N00	From IRS 3387702000USATAXPYMT227851066029902	12,207.88-
Apr 23	Wire Debit REF003196 BNF=MTACC INC 3160 CROW	TD BANK NA OF COLU 180423034930 CANYON RD STE 220	4,800.00-
Apr 23	Wire Debit REF003243 BNF=MTACC INC 3160 CROW	TD BANK NA OF COLU 180423035305 CANYON RD STE 220	8,794.00-
Apr 24	Express Bill Payment	Overnight Fee	14.95-
Apr 25	Electronic Withdrawal REF=181150088659440N00	From DENA R SINGER CP 9215986202SALE	560.00-
Apr 25	Wire Debit REF003569 BNF=MICHAEL STOLLAIRE NO	JPMORGAN CHASE BAN 180425030665 ADDRESS PROVIDED	100,000.00-
Apr 26	Electronic Withdrawal REF=181160088092100N00	From PAYROLL 4462800242PAYROLL 9525104	460.07-
Apr 26	Electronic Withdrawal REF=181160088092110N00	From PAYROLL 4462800242PAYROLL 9525104	1,155.50-
Apr 26	Electronic Withdrawal REF=181160088092120N00	From PAYROLL 4462800242PAYROLL 9525104	1,169.85-
Apr 26	Electronic Withdrawal REF=181160088092130N00	From PAYROLL 4462800242PAYROLL 9525104	1,193.44-
Apr 26	Electronic Withdrawal REF=181160088092140N00	From PAYROLL 4462800242PAYROLL 9525104	1,226.52-
Apr 26	Electronic Withdrawal REF=181160088092150N00	From PAYROLL 4462800242PAYROLL 9525104	1,365.79-
Apr 26	Electronic Withdrawal REF=181160088092160N00	From PAYROLL 4462800242PAYROLL 9525104	1,404.39-
Apr 26	Electronic Withdrawal REF=181160088092170N00	From PAYROLL 4462800242PAYROLL 9525104	1,512.83-
Apr 26	Electronic Withdrawal REF=181160088092180N00	From PAYROLL 4462800242PAYROLL 9525104	1,534.04-
Apr 26	Electronic Withdrawal REF=181160088092190N00	From PAYROLL 4462800242PAYROLL 9525104	1,548.67-
Apr 26	Electronic Withdrawal REF=181160088092200N00	From PAYROLL 4462800242PAYROLL 9525104	2,069.97-
Apr 26	Electronic Withdrawal REF=181160088092210N00	From PAYROLL 4462800242PAYROLL 9525104	3,064.92-
Apr 26	Electronic Withdrawal REF=181160088092220N00	From PAYROLL 4462800242PAYROLL 9525104	3,246.27-

EXHIBIT 74 PAGE 11

Actioned by :-
DEPARTMENT :- OR

A701106 OUTWARD PAYMENT REPORT

RPT1106 PAGE 3313
04/25/2018 20:20 CST

Cope Details

PAR : 180425030665
MAR :
Direction : SENT Priority : N
Payment Method: FEDWIRE Department : OR
Bank Amt : USD 100,000.00 Charges For : BENEFICIARY
USD 100,000.00 Original Amt :
Amt : 100000.00 Value Date : 04/25/2018
Date Sent : NOT SENT YET Payment Date : 04/25/2018
BNF : CTR SWIFT Address :
Fed Type: 1000 Advise 3rd Party Ben : NO
Advise Ben : NO Payment Ref : 180425030665 Repair Level : NO REPAIR
Payment Ref : 180425030665 Reference : 180425030665
Charge Profile: DEFAULT
Charges : USD 0.00

Debit1: Receiver
Sort Code : NOT AVAILABLE Sort Code : FW322271627
A/c: [REDACTED] 6688 A/c: [REDACTED] 0020
5250 HIGHBANKS RD STE 250 Bank Operation Code :
SPRINGFIELD CRED

Originator : Account with Bank :
[REDACTED] 6688 //FW322271627
TBIS JPMORGAN CHASE BANK NA SEATTLE WA
5250 HIGHBANKS RD STE 250 SEATTLE
SPRINGFIELD, OR, 97478 WA

Beneficiary : Charges :
[REDACTED] 722 SHA
MICHAEL STOLLAIRE
NO ADDRESS PROVIDED

CALLER: OBI :
JATAYLO/I/FN0613 RE: PAYOFF LINE OF CREDIT

Origin ID Hogan Reason (DR/CR)
1401 /HY00/ /

EXHIBIT 74 PAGE 12

Actioned by :-
DEPARTMENT :- OR

A701106 OUTWARD PAYMENT REPORT

RPT1106 PAGE 3316
04/25/2018 20:20 CST

{PAR:180425030665
{ID:00984}
{ABBR:JPMORGAN CHASE SEA}
{TYP:WIV}}

NOR Text Details

NOR TEXT = :

PAYTEAN Details

5250 HIGHTBANKS RD STE 250 SPRINGFIELD, OR, 97478

:59: [REDACTED] 722 MICHAEL STOLLAIRE NO ADDRESS PROVIDED
RE: PAYOFF LINE OF CREDIT

000000

EXHIBIT 74 PAGE 13

AFFIDAVIT OF CUSTODIAN OF RECORDS



usbank.com

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, M. Kathleen Patton, being duly sworn, depose and state as follows:

1. I am the Legal Records Custodian of U.S. Bank National Association, a corporation duly organized and existing under the laws of the United States, with offices at 800 Nicollet Mall, Minneapolis, Minnesota 55402, and as such have been designated as the Custodian of Records for the purpose of responding to the attached Subpoena Duces Tecum.

2. The documents delivered with this Affidavit in response to the Subpoena represent true and correct copies of documents which are in our files. These records were prepared in the ordinary course of business at or near the time of the act, condition or event.

DATED this 15th day of May, 2018.


Custodian of Records

Subscribed and sworn to before me this 15th day of May, 2018.


Notary Public

My Commission Expires:

1/31/2022



EXHIBIT 74 PAGE 14

EXHIBIT 75

correlation and root-cause analysis,
intrusion detection systems, and IT
security

Trusted by some of the World's Best Brands



SANTA BARBARA
BANK & TRUST

Cargill

• BOEING

EXHIBIT 75 PAGE 15

analysis, intrusion detection systems

enterprise management, event
correlation and root-cause analysis,
intrusion detection systems, and IT
security

environment, policies and pro

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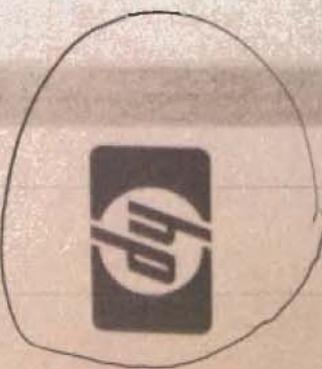
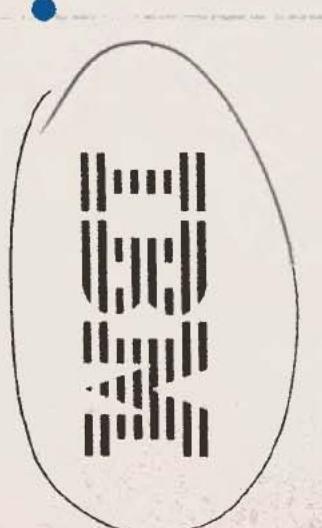
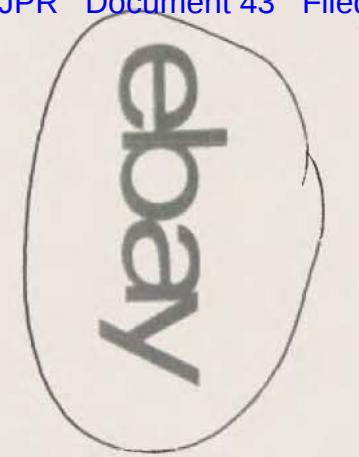


EXHIBIT 75 PAGE 16

analysis, intrusion detection systems

enterprise management, event
correlation and root-cause analysis,

intrusion detection systems, and IT
security

workshops to define your
environment, policies and pro-

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Hewlett Packard
Enterprise


AVNET


LogMatrix

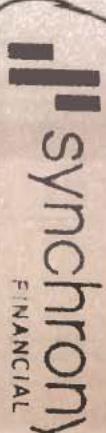

synchrony
FINANCIAL

EXHIBIT 75 PAGE 17